



## MEMORANDUM

To: Ms. Karina Fidler, Kimley-Horn

From: Jim Rocks, Rocks Biological Consulting

Date: January 27, 2020

Subject: City of Upland Bridge Project Field Survey Results

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This memo summarizes the field survey Rocks Biological Consulting (RBC) conducted at the Bridge Project (project) in the City of Upland, San Bernardino County, California on January 22, 2020. The approximately 50.25-acre project site is located north of Foothill Boulevard, west of Benson Avenue, east of Central Avenue and south of Cable Airport.

RBC biologist Ian Hirschler traversed the project site on-foot to document the general biological conditions and potential habitat for special-status species. Mr. Hirschler did not conduct focused surveys for special-status plant or wildlife species or a formal jurisdictional delineation for aquatic resources such as wetlands or other Waters of the U.S./State.

The project site consists of two vegetation communities: disturbed habitat and disturbed scale broom scrub. The disturbed habitat on site has been previously graded and an active rock-crusher was observed in the northwest portion of the project site. This habitat consists of non-native annual grasses and other herbaceous weedy species.

Disturbed scale broom scrub is present in the eastern half of the project site. This habitat consists of scattered individuals of scale broom (*Lepidospartum squamatum*), California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), laurel-sumac (*Malosma laurina*), and deerweed (*Acmispon glaber*). The scale broom scrub is highly disturbed by debris piles, off-road vehicle use, and homeless encampments and is further degraded by non-native invasive plant species such as filaree (*Erodium* sp.), tumbleweed (*Salsola tragus*), and castor bean (*Ricinus communis*).

The California Department of Fish and Wildlife (CDFW) California Natural Community List (2019) designates scale broom scrub vegetation communities as sensitive natural communities. Scale broom scrub habitats have a state ranking of S3. Vegetation communities with this ranking are considered vulnerable, with a moderate risk of extinction due to restricted range, relatively few populations, and recent and widespread declines globally and statewide. Natural Communities with ranks of S1-S3 are considered Sensitive Natural Communities to be addressed in the environmental review processes of the California

Environmental Quality Act (CEQA) (CDFW 2019). Due to its status as a sensitive natural community, impacts on the disturbed scale broom scrub onsite may require mitigation. Due to the highly disturbed condition of the scale broom scrub mitigation requirements may be less than those proposed for impacts on high quality, undisturbed scale broom scrub.

Suitable habitat for burrowing owl (*Athene cunicularia*), a CDFW Species of Special Concern, is present on the project site. Ground burrows of sufficient size for burrowing owl were observed in open scrub habitat and California ground squirrels (*Otospermophilus beecheyi*) were documented onsite. The numerous debris piles (see photo) also provide suitable refuge for burrowing owl. RBC recommends that two pre-construction surveys for burrowing owl, one 14 days and one 24 hours prior to construction activities, be conducted in accordance with the guidelines outlined in the CDFW *Staff Report on Burrowing Owl Mitigation* (2012). If documented on site, a burrowing owl exclusion plan may be required in coordination with CDFW.

There is no potential for federally or state-listed as threatened or endangered plant or wildlife species to occur on the project site. No jurisdictional aquatic resources were observed during the field survey. Based on the lack of these resources on the project site, no permits from the U.S. Fish and Wildlife Service, CDFW, and/or U.S. Army Corps of Engineers would be required.

Photographs documenting general site conditions are presented in Attachment A below.

#### References

California Department of Fish and Wildlife. 2012. *Staff Report on Burrowing Owl Mitigation*.  
California Department of Fish and Wildlife. 2019. California Natural Community List.

## Attachment A

### Site Photographs – January 22, 2020



Photo 1: View of the disturbed western portion of the project site, facing north. Active rock crushing shown in background.



Photo 2: View of scale broom scrub on the eastern portion of the project site.



Photo 3: View of the scale broom scrub on the eastern portion of the project site.



Photo 4: View of scale broom scrub with rock crushing in the background.





Photo 5: View of suitable burrowing owl burrows within scale broom scrub.



Photo 6: View of debris piles on-site. Debris piles provide suitable refuge for burrowing owls.